



**LOTTE CHEMICAL TITAN HOLDING BERHAD
REGISTRATION NO. 199101012045 (222357-P)**

WHISTLEBLOWING POLICY

VERSION 4.0

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COVERAGE OF THIS WHISTLEBLOWING POLICY

Lotte Chemical Titan Holding Berhad (“LCT”) and its Malaysian operating subsidiaries (collectively referred to as “the Group”) is committed to maintain good corporate governance practices and ethical standards in the conduct of its businesses and operations. The Directors of the Group are committed to uphold high standards of governance, accountability and fairness in discharging their duties and responsibilities. At all times, the Group shall be guided by the law with the notion of integrity being the value compass.

In line with **Practice 3.2 of the Malaysian Code on Corporate Governance**, this Whistleblowing Policy (“Policy”) aims to provide an opportunity for all Directors, employees of the Group as well as members of public to report any improper conduct relating to the Group without fear of reprisal.

All Directors, employees, and other stakeholders (e.g. customers, suppliers and other concerned parties) are strongly encouraged to report genuine concerns on improper conduct relating to the Group.

1.0 Introduction

- 1.1 Whistleblowing is a form of disclosure, enabling the whistleblower to raise concerns on actual or suspected wrongdoings concerning Associated Persons of the Group. This Policy is based on principles of fairness and transparency.
- 1.2 This Policy is formulated by taking into account the following laws and regulations including **Whistleblower Protection Act 2010, Malaysian Anti-Corruption Commission Act 2009, Occupational Safety and Health Act 1994, Main Market Listing Requirements of Bursa Malaysia Securities Berhad** and **Malaysian Code on Corporate Governance**.
- 1.3 Should there be any conflict between the contents of this Policy and the laws and regulations as stated above, the aforementioned laws and regulations shall prevail.

2.0 Application of the Policy

- 2.1 This Policy provides an additional channel for concerns regarding Associated Persons of the Group to be raised apart from the available mechanisms within the respective entities across the Group.
- 2.2 All complaints or reports must not be made with malicious intent, as doing so can result in the Group imposing serious penalty or action to be taken against them. Any complaints or reports made through the channels and procedures as set out in this Policy shall be treated as confidential.

3.0 Definitions

For the purposes of this Policy, unless otherwise stated, the terms listed below represents its respective definitions:

“Associated Persons”	Associated person shall be accorded with the same meaning outlined in Section 17A(6) as introduced vide Malaysian Anti-Corruption Commission (Amendment) Act 2018 . A person is associated to the Company if he or she is a director or employee of any entity within the Group or if he or she is a person who performs services for and or on behalf of the Group (e.g. agents).
“Board”	The Board of Directors of the respective entities within the Group.
“corruption”	Refers to an act of giving or receiving of any gratification, bribe or reward in the form of cash or in-kind of high value for performing a task in relation to his or her job description.
“Designated Recipient”	Refers to an individual within the Group who is authorised to receive the whistleblowing report.
“Director(s)”	Means the Director(s) of the Company in accordance with the definition provided in the Companies Act 2016 .
“employee”	Refers to a person who accepts a form of remuneration from the Group in exchange for services performed to or on behalf of the Group, either on a permanent, temporary, assignment, or secondment basis.
“Enforcement Agency”	Enforcement agency shall be ascribed with the same meaning as outlined in Section 2 of the Whistleblower Protection Act 2010 . Enforcement agency includes any ministry, department, agency or other body set up by the Federal Government, State Government or local government including a unit, section, division, department or agency of such ministry, department, agency or body, conferred with investigation and enforcement functions by any written law or having investigation and enforcement powers.
“Group”	Collectively refers to Lotte Chemical Titan Holding Berhad and its Malaysian operating subsidiaries.
“whistleblower”	Any person or a group of persons who submits a whistleblowing report via the channels outlined in this Policy. They include those who are employed by any entity within the Group as well as external parties who have business dealings with the Group and members of public.

4.0 Misconducts to be Reported

This Policy aims to encourage all stakeholders of the Group to raise genuine concerns about alleged misconducts and malpractices that may arise in the course of business dealings, which may include the following:

- (i) Fraud, bribery, corruption, dishonesty, insider trading;
- (ii) Theft, embezzlement or forgery;
- (iii) Abuse of power, position or the misuse of power and authority for personal gains;
- (iv) Involvement in any conflict of interest and/or business opportunities that was not previously or prior to the transaction, disclosed to the Group, Audit Committee or Board as the case may be;
- (v) Unauthorised use of Group's money, properties, facilities and/or misappropriation of assets;
- (vi) Non-compliance with the Business Ethics & Code of Conduct ("BECOC") or any of the Group's procedures that may cause significant harm to the Group's interest; and
- (vii) Any breaches to the laws and regulations which can constitute as a criminal act.

If an employee is unsure whether a particular act or omission constitutes a wrongdoing under this Policy, the employee is encouraged to seek advice or guidance from his immediate superior or the Legal and Compliance team.

5.0 Reporting Channels and Procedures

5.1 For Employees

When an employee observes or uncovers any unethical or illegal conduct, and intends to make a formal complaint or report, the employee can do so via the following channels to the:

- (i) immediate superior either verbal or in writing; or
- (ii) Compliance Officer via email at compliance@lottechem.my; or
- (iii) Chairman & CEO via the Moin BECOC board; or
- (iv) Audit Committee Chairman via email at ac@lottechem.my.

Employee generally should use form attached in **Appendix 1** to make any complaint or report.

5.2 For members of public

Members of public who wish to make a complaint or report, may do so by using the form as attached in **Appendix 1** via email to the Legal & Compliance team at compliance@lottechem.my or Audit Committee Chairman via email to ac@lottechem.my. The form will be available in LCT's website for the members of public.

5.3 What whistleblowers should provide

In order for the Group to investigate the wrongdoing reported, the whistleblower is to provide the following particulars in the report:

- particulars of whistleblower i.e. name, NRIC No., designation (if the whistleblower is an employee of the Group) and contact particulars (email, telephone or mobile number and/or address);
- details and description of the alleged wrongdoing, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if whistleblower is not able to identify the identity of the person(s) involved;
- particulars of witnesses, if any; and
- particulars or production of documentary evidence, if any.

5.4 All complaints or reports received must be notified to the Compliance Officer and the Audit Committee.

6.0 Confidentiality of Identity

6.1 The Group will protect the identity of the whistleblower(s) who made the report in good faith. Such information will be held to the extent legally permissible and reasonably practicable, in the strictest confidence, by the Group (i.e. the whistleblower's identity shall be protected and kept confidential unless otherwise required by the law or for the purpose of any proceedings by/or against the Group).

6.2 However, it should be noted that during the investigation process, including any report that may or have to be made to the enforcement agencies or authorities, the Group may reveal the source of the information, and a statement by the whistleblower(s) may be required as part of the evidence. In order to maintain confidentiality, no information concerning the status of an investigation shall be divulged to anyone outside the investigation. The proper response to any inquiry is: "I am not at liberty to discuss this matter". Under no circumstances shall any reference be made to "the allegation", "the crime", "the fraud", "the forgery", "the misappropriation" or any other specific adverse reference.

6.3 Once the whistleblower has provided the disclosure, he or she should not:

- a) confront the alleged wrongdoer; and
- b) discuss the case, facts, suspicions, allegations, or any other information related to the case with anyone.

6.4 The whistleblower's identity may be revealed based on the following circumstances:

- a) to facilitate the investigation process, a statement by the whistleblower may be required as part of the evidence;
- b) where it is required by the law, Enforcement Agency, regulatory body or such other body that has the jurisdiction and authority of the law to require such identity to be revealed;

- c) where it is in the best interest of the Group to disclose the identity of the whistleblower after the concurrence of the Board; or
- d) the disclosure by the whistleblower was frivolous and in bad faith or for personal gain.

7.0 Investigation Procedures

- 7.1 For reports concerning misconducts, the investigation procedure will follow that as provided for under the Human Resource Department Disciplinary Procedure.
- 7.2 In instances where the disclosure of improper conduct is not substantiated, the Designated Recipient shall inform the whistleblower accordingly.
- 7.3 The investigation of the disclosure should be finalised as soon as practicable and given priority, particularly if the wrongdoing is capable of causing significant financial or reputational harm to the Group.
- 7.4 The whistleblower may report the same disclosure to another Designated Recipient (which may be for different level of disclosure) if:
 - the status of the disclosure is not communicated to the whistleblower within a reasonable time period;
 - the wrongdoing involves a Designated Recipient; or
 - where the wrongdoing does not involve the Designated Recipient but the whistleblower, in good faith, reasonably believes that the Designated Recipient may be personally conflicted (for instance, the Designated Recipient is an ally of the alleged wrongdoer).

8.0 Protection to Whistleblower

- 8.1 In an effort to promote transparency, accountability and good corporate governance in the workplace, employees must be able to raise concerns without the fear of reprisals. No employee, who in good faith reports any violation of the BECOC, Anti-Bribery & Anti-Corruption Manual or other laws and regulations shall suffer harassment, retaliation or adverse employment consequences. Any personnel who retaliates against the whistleblower will be subjected to disciplinary actions by the Group, including but not limited to dismissal.
- 8.2 Upon providing disclosure, the whistleblower will not be allowed to discuss or reveal facts or information to any persons regarding the nature of the case in order to avoid speculation and further conjecture. To ensure confidentiality, all reports or disclosures shall be kept classified unless applicable laws requires disclosure to Enforcement Agency. In the event of an investigation, if a whistleblower is called into for questioning, he or she may be required to enter a statement of evidence and in some cases, the whistleblower might have to reveal their identity if it helps to facilitate the investigation process. In such instances, any information concerning the investigation shall not be revealed to anyone outside the case as the only parties privy to the information are the persons involved in the investigating process.

8.3 The Group acknowledges that the act of whistleblowing is a decision that is difficult to make especially against direct superior or important personnel within the Group. Therefore, the Group will not tolerate mistreatment of any whistleblower and will ensure that individual will be treated fairly and justly. If the report is made in good faith, with reasonable grounds to believe that the information and allegations are substantially true, the whistleblower shall be protected against any forms of retaliation including disciplinary action from their immediate superior or from any other persons exercising authority over the whistleblower's employment or service for the Group.

8.4 The whistleblower is also protected from any form of retaliation from the alleged wrongdoer. If the whistleblower has good reason to believe that they are a victim of retaliation, they may report this to the Group's Legal & Compliance team and request for protection.

In addition to the above, the **Occupational, Safety & Health Act 1994**, in particular **Section 27(1)** states that no employee shall be dismissed by reason of him making a complaint to the Enforcement Agency or the Group about any health and safety issue.

8.5 The whistleblower will not be subjected to a civil action by the Group if disclosure was made in good faith and based on reasonable grounds.

9.0 Revocation of Protection

9.1 Any individual who makes a report recklessly without having reasonable grounds for believing the matter to be substantially true or makes a report for purposes of personal gain, may be subjected to appropriate action(s) by the Group. Such reckless reporting include:

- a) having participated in the improper conduct disclosed;
- b) made a disclosure in which he or she knew or believed to be false (for instance, dishonest, frivolous mischievous or malicious complaints);
- c) made a disclosure that is frivolous and vexatious; or
- d) made a disclosure to avoid dismissal or other disciplinary action.

9.2 Disclosures that are pending or already determined through the Group's disciplinary proceedings, and disclosures pending through local or international authorities such as the courts, arbitration bodies, or other similar proceedings shall not be further acted upon by the Group, whether the whistleblower was aware or not of the situation upon disclosure.

10.0 Being Informed

10.1 The Group shall inform the whistleblower on the following, to the extent deemed appropriate in its sole discretion:

- The status of his or her report in terms of being forwarded for investigation or disregarded;
- The justifications on why such report is disregarded;
- The disciplinary action taken against the alleged wrongdoer if he or she is found guilty of committing the alleged misconduct or malpractice.

10.2 The whistleblower shall respect all decisions made by the investigation team.

11.0 Monitor and Review of this Policy

11.1 The Legal & Compliance team shall maintain a register for all disclosures made pursuant to this Policy. All documents obtained pertaining to disclosures shall be considered “Confidential” and be stored securely as provided under **Section 9 of the Personal Data Protection Act 2010**. The disclosures shall be kept under the custody of the Legal & Compliance team for seven (7) years, or longer as may be decided by the Audit Committee of LCT.

11.2 In adherence to **Section 10 of the Personal Data Protection Act 2010**, the disclosures shall not be kept longer than necessary. The Legal & Compliance team shall undertake reasonable steps to ensure the disclosures are destroyed or permanently deleted after the designated timeframe.

11.3 The Legal & Compliance team shall, on a quarterly basis, update the Audit Committee of the Group and/or Board on the number of disclosures received to date and nature of such disclosures, status of investigations, and other relevant updates.

11.4 The Legal & Compliance team shall monitor the implementation and understanding of this Policy.

12.0 Administration of this Policy

12.1 The Group aims to ensure that this Policy closely reflects the applicable laws and regulations as well as industry better practices pertaining to whistleblowing. The Head of Legal & Compliance shall be responsible for reviewing and assessing this Policy in terms of its effectiveness and areas of enhancement from time to time, as and when necessary.

12.2 The Group shall communicate this Policy to all employees including those working with and on-behalf of the Group as well as other stakeholders. A copy of this Policy is to be made available on the Group’s website and intranet of the respective entities within the Group.



WHISTLEBLOWING FORM

A. PARTICULARS OF WHISTLEBLOWER

Name
(As per NRIC/ Passport)
: _____

NRIC/ Passport no.
: _____

Employee no.*
: _____

Designation and Department*
: _____

Correspondence address
: _____

Contact no.
H/P: _____ Office: _____ Email address: _____

** For the Group's employees only*

B. PARTICULARS OF ALLEGED WRONGDOER

Name of the Alleged Wrongdoer committing Improper Conduct
: _____

Designation and Department (if known)
: _____

C. DETAILS OF THE IMPROPER CONDUCT

1) Has the improper conduct been committed or about to be committed? Has happened Suspect to happen
Please mark (X) where applicable.

2) Nature of the improper conduct –

3) Have you previously made a disclosure/complaint of the improper conduct to any external authorities or enforcement agencies?

Yes No

If Yes, please provide the following particulars:

Name of authority receiving the disclosure/complaint: _____

Designation and Department (if applicable) : _____

Date the disclosure/complaint was made : _____

Status of the disclosure/Complaint (if known) : _____

DECLARATION

I hereby declare that all the information given herein are made voluntarily and true to the best of my knowledge and I will be entitled to the whistleblower protection from the Group as prescribed under **Paragraph 8.0** in the Group’s Whistleblowing Policy. I understand further that in the event I have made this disclosure maliciously or in bad faith, the whistleblower protection prescribed under **Paragraph 8.0** will no longer be applicable to me and I may be subjected to disciplinary or legal proceedings by the Group.

Signature and Date

Please forward this Whistleblowing Form together with any supporting documents to the Legal & Compliance team at compliance@lottechem.my.